

ORIGINAL



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EX PARTE OR LATE FILED

December 1, 1999

The Honorable William E. Kennard
Chairman
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Ex Parte Presentation in MM Docket No. 98-204

Dear Mr. Chairman,

I am writing to report on a recent development that sheds considerable light on the continuing need for the kind of affirmative action rules that the Commission had in place for many years until the Court of Appeals' decision in the *Lutheran Church* case. According to NAB's database, the number of women in TV general manager positions has risen nearly 39% in the last year. I am enclosing a copy of the NAB survey, which was also reported in *Broadcasting & Cable* on November 1, 1999.

This is a remarkable increase. It is likely that these numbers are a result of women "coming up through the ranks" into the general manager positions. It is important to note that this achievement comes at a time when the broadcasting industry has been operating without any FCC-mandated EEO rules.

The EEO proposal that the Commission has under consideration would maintain the Commission's traditional focus on recruitment efforts for every job opening. NAB proposed an alternative approach that, instead of focusing only on initial recruitment and burdensome paper-work records, sought to foster diversity in broadcasting through a wide variety of means. We proposed, for example, that stations be given credit for mentoring, training and internship programs. These kinds of activities would give qualified individuals more opportunity to move up the employment ladder and break the so-called "glass ceiling." An example of a program that would be encouraged under NAB's proposed rule is an NAB Education Foundation program where 15 minority or female employees of broadcast stations will receive a year-long "MBA-style" education designed to give them the skills and knowledge needed to move into station ownership. We think this approach is far superior to the Commission's longstanding focus on recruitment for individual jobs.

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NAB's goal in proposing a different approach to affirmative action was to encourage a culture which makes encouraging diversity a normal part of broadcasters' expectations, rather than a burden to be fulfilled by merely providing information to specified groups and filling out required forms. To that end, we have worked with the Broadcast Executive Directors Association on a program that 47 state broadcasting associations have joined which gives stations with openings and job applicants an easy way to find each other over the Internet. Combined with the mentoring and educational efforts would also be encouraged under NAB's proposal, we think that the Commission can achieve more effective results, with fewer burdens on stations and with less risk of legal challenge, than by efforts to reinstate the programs of the past.

We believe the dramatic increase in the number of female managers in the TV industry demonstrates that the view of broadcasting as closed to employees who are different in gender or race than those who were hired in the past is wrong. We encourage the Commission to adopt a different type of EEO rule – one that will help stations continue to diversify their workforces and provide increased opportunity for advancement.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Eddie", is positioned below the "Respectfully submitted," text.

Attachments

cc: The Honorable Susan Ness
The Honorable Michael Powell
The Honorable Harold Furchtgott-Roth
The Honorable Gloria Tristani
Roy J. Stewart
Christopher J. Wright
Paulette Laden

Women Station Executives

Oct. 1999

	1998	1999	% Change
General Managers	131	182	38.9%
Station Managers	20	26	30.0%
Total	151	208	37.7%

Single/Group Owned	Name	Title	Calls	Location
	Kim Alexander	General Manager	WSVI	Christiansted, VI
	Rickie Brady	General Manager	KIFI-TV	Idaho Falls, ID
	Ginny Brown	Station Manager	WUPN-TV	Greensboro, NC
	Dorothy Brunson	President & General Manager	WGTV-TV	Burlington, NJ
	Alice Cheney	General Manager	WIPB	Muncie, IN
	Marilyn Clark	VP/Station Manager	WLEX-TV	Lexington, KY
	Pam Clark	Station Manager	WDCP-TV	Bad Axe, MI
	Donna Cole	General Manager	WNDS	Derry, NH
	Wanda Costanzo	General Manager	WSTE	Ponce, PR
	Trina Cutter	President/General Manager	WNIT-TV	South Bend, IN
	Kathleen Davey	General Manager	WGCU-TV	Ft. Myers, FL
	Jennifer Denninton	Station Manager	WLOV-TV	West Point, MS
	Nancy Dobbs	President and CEO	KRCB	Cotati, CA
	Catherine Donavan	General Manager	WAGM-TV	Presque Isle, ME
	Adrienne Dowling	General Manager	WPBA	Atlanta, GA
	Jane Duff	President	KNMT-TV	Portland, OR
	Deborah Emond	General Manager	KCKA	Centralia, WA
	Annette Garcia	Station Manager	KCHF	Santa Fe, NM
	Elsie Garner	General Manager	WEDU	Tampa, FL
	Gay Hammer	Station Manager	KRMJ	Grand Junction, CO
	Debbie Hart	General Manager	WPGA	Perry, GA
	Cheri Howland	General Manager	KDMD	Anchorage, AK
	Patricia Huber	President	WBPH-TV	Bethlehem, PA
	Donna Kam	General Manager	KFVE	Honolulu, HI
	Sherrie Karr	General Manager	KVMD	Twentynine Palms, CA
	Sandy Keefer	General Manager	KTAS	San Luis Obispo, CA
	Anne Keith	Station Manager	WBNX-TV	Akron-Cleveland, OH
	Arlene Kimata	General Manager	KCAH	Watsonville, CA
	Jane Kolsack	Station Manager	KFBT	Las Vegas, NV
	Carol LaFever	General Manager	WGRB	Campbellsville, KY
	Emily Lahti	General Manager	KAWB	Brainerd, MN
	Kim Leach	Station Manager	WUXP	Nashville, TN
	Linda Lillie	Station Manager	KHIZ	Barstow, CA
	Dolly Lynn	General Manager	WQHB	Sumter, SC
	Nancy Martinson	General Manager	WLAX	La Crosse, WI
	Sue Mayborn	President	KCEN-TV	Temple, TX
	Darlene McHenry	General Partner	KBEH	Bellevue, WA
	E. Messinger	President/GM	WTSF	Ashland, KY
	Bertha Mitchell	General Manager	KQCA	Stockton, CA
	Magarita Nazorio	General Manager	WVOZ	Ponce, PR
	Lynda Nicholls	General Manager	KNDO	Yakima, WA
	Lisa Nilmeier	General Manager	KMSG-TV	Sanger, CA
	Kathleen Pavelko	President/GM	WITF-TV	Harrisburg, PA
	Gloria Penn Easton	General Partner	WACI	Atlantic City, NJ
	Lillian Perez	General Manager	WIRS	Yauco, PR
	Caroline Powley	President and General Manager	WNGS	Springville, NY
	Judy Querio	President	KSKN	Spokane, WA
	Susan Reed	General Manager	KAKM	Anchorage, AK
	Grace Rendall	General Manager	KSCE-TV	El Paso, TX
	Clara Rivas	General Manager	KSBS-TV	Steamboat Spring, CO
	Barbara Roberts	General Manager	WUTR	Utica, NY
	Cris Salsbury	General Manager	KSKN	Spokane, WA
	Carol Schatz	General Manager	KYES	Anchorage, AK
	Carolyn Smith	President	WWSB	Sarasota, FL
	Karen Sneed-White	Station Manager	WYLE	Florence, AL
	Patricia Stone	Vice President/Program Director	KUSK	Prescott, AZ
	Shirley Timonere	President & General Manager	WGTE-TV	Toledo, OH
	Ginger Underwood	General Manager	KGTF	Agana, GU
	Beth Vershure	Station Manager	KAET	Phoenix, AZ
	Lucy Villanueva	General Manager	WUJA	Caguas, PR

Single/Group Owned	Name	Title	Calls	Location
	Susan Walters	Station Manager	WNTD	Daytona Beach, FL
	Sarah White	President & General Manager	KOZK	Springfield, MO
	Tammy Willieford	General Manager	WBTR-TV	Baton Rouge, LA
	Joanne Winik	President/Station Manager	KLRN-TV	San Antonio, TX
A. H. Belo Corporation	Kathy Clements-Hill	President & General Manager	WFAA-TV	Dallas, TX
A. H. Belo Corporation	Diane Frisch	Vice President & General Manager	KMSB-TV	Tucson, AZ
A. H. Belo Corporation	Jimmie Phillips	General Manager	WWL-TV	New Orleans, LA
A. H. Belo Corporation	Patti Smith	Vice President/General Manager	KVUE-TV	Austin, TX
ABC Broadcast Group	Emily Barr	President & General Manager	WLS-TV	Chicago, IL
ABC Broadcast Group	Valari Dobson-Staab	President-General Manager	KFSN-TV	Fresno, CA
Ackerley Communications Inc.	Jeanne Buheit	General Manager	KVIQ-TV	Eureka, CA
Ackerley Communications Inc.	Cambra Ward	Station Manager	KMTR-TV	Eugene, OR
All American TV Inc.	Devita Simpson	General Manager	WPGD	Hendersonville, TN
Benedek Broadcasting Corporation	Tracey Jones	Vice President and General Manager	WHSV-TV	Harrisonburg, VA
Benedek Broadcasting Corporation	Patricia J. Niekamp	General Manager	WYTV	Youngstown, OH
Benedek Broadcasting Corporation	Regina Sanders	Vice President & General Manager	KMIZ	Columbia, MO
Blade Communications Inc.	Tina Parker	Station Manager	WLFI-TV	Lafayette, IN
Brechner Management Company	Kathleen McLain	General Manager	WMDT	Salisbury, MD
CBS Television Stations	Jan McDaniel	Vice President and General Manager	WCCO-TV	Minneapolis, MN
Clear Channel Communications	Sharon Moloney	VP/General Manager	WPMI	Mobile, AL
Clear Channel Communications	Diana Wilkins	Vice President/General Manager	KSAS-TV	Wichita, KS
Communications Corp. of America	Amy Villarreal	General Manager	KVEO	Brownsville, TX
Continental Network Television	Cheryl Cordeiro	General Manager	KWYB	Butte, MT
Cosmos Broadcasting Corp.	Lucy Himstedt	General Manager	WFIE-TV	Evansville, IN
Cox Broadcasting	Teresa Burgess	General Manager	KFOX-TV	El Paso, TX
Dix Communications	Sue Johnson	General Manager	KFBB-TV	Great Falls, MT
DP Media	Cheryl Snell	General Manager	WPXS	Mt Vernon, IL
Emmis Communications Corporatio	Madelyn Bonnot	General Manager	WVUE	New Orleans, LA
Emmis Communications Corporatio	Donita Todd	General Manager	WFTX	Cape Coral, FL
Entravision Communications Co.	Yrma Rico	General Manager	KCEC	Denver, CO
Entravision Communications Co.	Elia Solis	General Manager	KLDO-TV	Laredo, TX
Evangelistic Alaska Missionary Fello	Julie Beaver	General Manager	KJNP-TV	North Pole, AK
Fisher Broadcasting Inc.	Janet Allen	VP/Station Manager	KATU	Portland, OR
Fox Television Stations Inc.	Karen Adams	Vice President and General Manager	WGHP	High Point, NC
Fox Television Stations Inc.	Stacey Marks-Bronner	VP and General Manager	WFLD	Chicago, IL
Fox Television Stations Inc.	Laureen Ong	Vice President and General Manager	WTTG-TV	Washington, DC
Fox Television Stations Inc.	Carol Rueppel	Vice President & General Manager	WITI	Milwaukee, WI
Fox Television Stations Inc.	Kathy Saunders	Vice President & General Manager	KDFW	Dallas, TX
Fox Television Stations Inc.	Diane Vargas	Vice President and General Manager	KTTV	Los Angeles, CA
Freedom Communications Inc.	Susan Kelley	General Manager	KTVL	Medford, OR
Freedom Communications Inc.	Doreen Wade	General Manager	WPEC	West Palm Beach, FL
Gannett Broadcasting	Lynn Beall	President & General Manager	KSDK	St Louis, MO
Gannett Broadcasting	Deborah Hooper	Vice President and General Manager	WFMY-TV	Greensboro, NC
Gannett Broadcasting	Judy Horan	General Manager	WLBZ	Bangor, ME
Gannett Broadcasting	Janet Mason	President & General Manager	WZZM-TV	Grand Rapids, MI
Gannett Broadcasting	Susan Newkirk	President and General Manager	KTHV	Little Rock, AR
Gannett Broadcasting	Noreen Parker-Keyser	Vice President/General Manager	WTSP	St Petersburg, FL
Granite Broadcasting Corporation	Sarah Norat-Phillips	President & General Manager	WDWB	Detroit, MI
Grapevine Communications	Bonnie Foster	General Manager	KTWO-TV	Casper, WY
Gray Communications Systems	Ernestine Cornett	Station Manager	WYMT-TV	Hazard, KY
Gray Communications Systems	Cheri Weinke	General Manager	WEAU-TV	Eau Claire, WI
Gtr Wash Educ Telecomm Assn	Sharon Rockefeller	President/CEO	WETA-TV	Washington, DC
Hearst-Argyle Television, Inc.	Phyllis Ned	Vice President/General Manager	KETV	Omaha, NE
Hearst-Argyle Television, Inc.	Victoria Regan	Vice President and General Manager	WPBF	Tequesta, FL
Hearst-Argyle Television, Inc.	Mary Lynn Roper	Vice President/General Manager	KOAT-TV	Albuquerque, NM
Hubbard Television Group	Susan Anderson	Vice President/Station Manager	KSAX	Alexandria, MN
Huntsville TV Acquisition Corp	Kathy DeBoeuf	General Manager	KLJB-TV	Davenport, IA
International Media Group	Joanne Ninomiya	General Manager	KIKU-TV	Honolulu, HI
Jefferson-Pilot Communications Co.	Mary MacMillan	General Manager	WBTV	Charlotte, NC
Journal Broadcast Group, Inc.	Kris Foate	Vice President/General Manager	KTNV-TV	Las Vegas, NV

Single/Group Owned	Name	Title	Calls	Location
Journal Broadcast Group, Inc.	Judy Kenney	Vice President/General Manager	WSYM-TV	Lansing, MI
KB Prime Media LLC	Sue Ellen Clyatt	General Manager	WFXU	Live Oak, FL
KQED, Inc.	Mary Bitterman	General Manager	KQED	San Francisco, CA
KSIX Television, Inc.	Vivian Mitchell	Station Manager	KZTV	Corpus Christi, TX
KSIX Television, Inc.	Deborah Murphy	General Manager	KVTV	Laredo, TX
Lamco Communications, Inc.	Jackie Rutledge	Vice President/General Manager	KTXS-TV	Sweetwater, TX
Landmark Broadcasting	Debbie Turner	Station Manager	WTVF	Nashville, TN
Lee Enterprises, Inc.	Sharolyn Funk	Station Manager	KSNG-TV	Garden City, KS
Lee Enterprises, Inc.	Lynne Mueller	General Manager	KGMB	Honolulu, HI
LeSea Inc.	Pamela Beene	General Manager	WHNO-TV	New Orleans, LA
LeSea Inc.	Elaine Jackson	General Manager	KWHH	Hilo, HI
LIN Television Corporation	Gail Brekke	President & General Manager	KXAN-TV	Austin, TX
LIN Television Corporation	Diane Kniowski	President & General Manager	WOOD-TV	Grand Rapids, MI
Manship Stations	Patricia Cheramie	General Manager	WBRZ	Baton Rouge, LA
McGraw-Hill Broadcasting Co.	Cindy Velasquez	Vice President & General Manager	KMGH-TV	Denver, CO
Mel Wheeler, Inc.	Betsy Farris	Vice President & General Manager	KRCG	Jefferson City, MO
Meredith Corporation Broadcasting	Linda Sherman	General Manager	WHNS	Asheville, NC
NBC Television Stations Division	Lisa Churchville	President & General Manager	WJAR	Providence, RI
NBC Television Stations Division	Phyllis Schwartz	President/General Manager	KNSD	San Diego, CA
NBC Television Stations Division	Linda Sullivan	President/General Manager	WRC-TV	Washington, DC
New York Times Co. Bcstg. Group	Rene' LaSpina	President/General Manager	WNEP-TV	Scrant-Wilk Ba, PA
New York Times Co. Bcstg. Group	Marion Meginnis	General Manager	WQAD-TV	Moline, IL
New York Times Co. Bcstg. Group	Linda Spalla	President/General Manager	WHNT-TV	Huntsville, AL
New York Times Co. Bcstg. Group	Sandra Yost	President & General Manager	WTKR-TV	Norfolk, VA
NexStar Broadcasting Group	Julie Pruett	Vice President & General Manager	KFDX-TV	Wichita Falls, TX
NexStar Broadcasting Group	Diane Sutter	President	KTAB-TV	Abilene, TX
North TX Public Broadcasting	Cheryl Cragie	President & CEO	KDTN	Denton, TX
Paramount Stations Group	Katherine Bridgman	Vice President & General Manager	WNDY	Marion, IN
Paramount Stations Group	Meg LaVigne	Vice President & General Manager	WGNT	Portsmouth, VA
Paramount Stations Group	Kathy Sparks	General Manager	WUPL	Slidell, LA
Paramount Stations Group	Sue Stuecheli	General Manager	KAUT-TV	Oklahoma City, OK
Paxson Communications Corporatio	Robyn Bombard	General Manager	WSPX	Syracuse, NY
Paxson Communications Corporatio	Barbara Brill	General Manager	KPXO	Kaneohe, HI
Paxson Communications Corporatio	Carol Denham	General Manager	KPXF	Porterville, CA
Paxson Communications Corporatio	Dawn Hoglins	Station Manager	KPXM	St. Cloud, MN
Paxson Communications Corporatio	Sandy Moses	General Manager	WFPX	Fayetteville, NC
Paxson Communications Corporatio	Carolyn Navarra	General Manager	WPXM	Miami, FL
Paxson Communications Corporatio	Michele Wilson	General Manager	WPXW	Manassas, VA
Paxson Communications Corporatio	Carol Wright-Holzhaus	General Manager	KPXB	Conroe, TX
Post-Newsweek Stations, Inc.	Sherry Burns	Vice President/General Manager	WJXT	Jacksonville, FL
Post-Newsweek Stations, Inc.	Kathleen Keefe	Vice President & General Manager	WKMG-TV	Orlando, FL
Post-Newsweek Stations, Inc.	Ann Sutton	Station Manager	WJXT	Jacksonville, FL
Quorum Broadcasting Company, Inc	Lydia Sandifer	Vice President & General Manager	KARD	West Monroe, LA
Quorum Broadcasting Company, Inc	Patty Hamilton	General Manager	WQRF-TV	Rockford, IL
R.D.S. Broadcasting, Inc.	Peggy Marsh	General Manager	KTFO	Tulsa, OK
Raycom Media Inc.	Dorothy Fees Havens	General Manager	WAFF	Huntsville, AL
Red River Broadcast Corp.	Kathy Lau	Vice President/General Manager	KBRR	Thief River Fall, MN
Scanlan Communications	Sue Rutkofske	Station Manager	WGTU	Traverse City, MI
Scripps Howard Broadcasting Co.	Grace Gilchrist	Vice President & General Manager	WXYZ-TV	Detroit, MI
Sinclair Broadcast Group Inc.	Melissa Gaines	General Manager	KSMO-TV	Kansas City, MO
Sinclair Broadcast Group Inc.	Maria Moore	President and General Manager	WTWC	Tallahassee, FL
Sinclair Broadcast Group Inc.	Sheila Oliver	General Manager	WCGV-TV	Milwaukee, WI
SJL Broadcast Management Corp.	Sandy Benton	President & General Manager	WICU-TV	Erie, PA
Spartan Communications, Inc.	Lou Kirchen	Vice President/General Manager	WBTW	Florence, SC
Sunbelt Communications Company	Kathy Brody	General Manager	KJWY	Las Vegas, NV
Sunrise Television Corporation	Debra Burton	General Manager	KUMV-TV	Williston, ND
Sunrise Television Corporation	Holly Steuart	General Manager	KFYR-TV	Bismarck, ND
The Green Group	Jane Stark	General Manager	WMGM-TV	Wildwood, NJ
Tri-State Christian Television	Fortune Brayfield	General Manager	WTCT	Marion, IL
Tri-State Christian Television	Anna VanDeventer	General Manager	WINM	Angola, IN

Single/Group Owned	Name	Title	Calls	Location
Tribune Broadcasting Company	Leslie Glenn	Vice President & General Manager	WLVI-TV	Cambridge-Bost, MA
Tribune Broadcasting Company	Linda Gray	Vice President/General Manager	WXIN	Indianapolis, IN
Tribune Broadcasting Company	Diane Howard	Station Manager	WEWB	Albany, NY
Tribune Broadcasting Company	Lise Markham	Vice President-General Manager	KSWB-TV	San Diego, CA
Tribune Broadcasting Company	Pamela Pearson	Vice President/General Manager	KCPQ	Tacoma, WA
Trinity Broadcasting Network	Mary Jane Allen	General Manager	KTBW-TV	Tacoma, WA
Trinity Broadcasting Network	Fern Deaver	General Manager	KTBO-TV	Oklahoma City, OK
Trinity Broadcasting Network	Margie Gonzales	General Manager	KLUJ	Harlingen, TX
Trinity Broadcasting Network	Mary Laird	General Manager	WKOI	Richmond, IN
Trinity Broadcasting Network	Velma Morlin	General Manager	KETH	Houston, TX
Trinity Broadcasting Network	Billy Watts	Station Manager	KPAZ-TV	Phoenix, AZ
United Communications Corp.	Cathy Pircsuk	General Manager	WWNY-TV	Carthage-Waterto, NY
United Television Inc.	Susan Jaramillo	Station Manager	WRBW	Orlando, FL
University of Utah	Helen Lacy	General Manager	KULC	Ogden, UT
Univision Television Group	Jane Fiore	General Manager	WGBO-TV	Joliet, IL
Univision Television Group	Theresa Ford	Station Manager	KUVI-TV	Bakersfield, CA
Univision Television Group	Maria Guterrez	General Manager	KFTV	Hanford-Fresno, CA
Univision Television Group	Marcela Medina	General Manager	KDTV-TV	San Francisco, CA
Univision Television Group	Rebecca Munoz-Diaz	VP / General Manager	KUVN	Garland, TX
Univision Television Group	Cristina Schwarz	Vice President & General Manager	WXTV	Paterson, NJ
USA Broadcasting	Francisa Bryden	General Manager	WHSB-TV	Marlborough, MA
USA Broadcasting	Lauren Collier	General Manager	WHSI-TV	Smithtown, NY
USA Broadcasting	Sylvia Willis	General Manager	WBSF	Melbourne, FL
West Virginia Educ. Bcg. Auth.	Carolyn Lewis	General Manager	WNPB-TV	Morgantown, WV
WGBH Educational Foundation	Deborah Onslow	General Manager	WGBY-TV	Springfield, MA
White Knight Holdings Inc.	Cindy Hansen	Station Manager	KKWB	El Paso, TX
Young Broadcasting Inc.	Gwen Kinsey	General Manager	WTVO	Rockford, IL
Young Broadcasting Inc.	Jan Wade	Vice President & General Manager	WATE-TV	Knoxville, TN